

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DOCTOR MARC HAMET,

11 cv 7743 BSJ

Plaintiffs,

AMENDED COMPLAINT

-against-

JURY TRIAL DEMANDED

JENNIFER BRIDGE AND LAURI KOVENS ,

Defendant(s).
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The plaintiff, complaining of the defendants, by his attorney, FRED LICHTMACHER, ESQ., respectfully shows to this Court and alleges:

JURISDICTION

1 Jurisdiction is founded upon diversity.

2 This is an action for various state claims including but not limited to defamation and
defamation per se.

3 Jurisdiction is founded upon 28 U.S.C. § 1332(a)(1).

4 Venue is appropriate pursuant to 28 U.S.C. §§ 1391 (a)(2 & 3).

PARTIES

5 The plaintiff, DOCTOR MARC HAMET is a triple board certified radiologist who resides
in Riverside Connecticut.

6 The defendant Jennifer Bridge resides in Maryland at 1 Mullingar Ct, Unit 201 Lutherville
Timonium, MD 21093-7814.

7 The defendant Lauri Kovens resides at 841 Queens Park Dr Reisterstown Md 21117.

STATEMENT OF FACTS

8 On January 25, 2011 plaintiff Dr. Marc Hamet, was made aware of a posting on the website
www.vitals.com which stated “Marc is a very sick man and hides behind the title of “doctor” to
make people think he is alright. The truth is he has molested children and might still be doing it.

Do NOT go to him.”

9 The posting was dated November 16, 2010 and given a 1-star rating and the title was “MOLESTER.”

10 Upon information the posting was made jointly by defendants Jennifer Bridge and Lauri Kovens.

11 The posting was made from defendant Koven’s place of employment in Maryland.

12 Plaintiff is not now and never has been a child molester.

AS AND FOR A FIRST CAUSE OF ACTION
ON BEHALF OF PLAINTIFF
VIOLATION OF THE PLAINTIFF’S RIGHTS PURSUANT TO
THE COMMON LAW OF THE STATE OF NEW YORK
via DEFAMATION and DEFAMATION PER SE

13 Plaintiff repeats, reiterates and realleges each and every allegation contained in the prior paragraphs with the same force and effect as is more fully and at length set forth herein.

14 The plaintiff’s rights have been violated pursuant to the common law of the State of New York in that he has been subjected to defamation and defamation per se by the defendants.

15 Defendants have caused a statement which is defamatory and defamatory per se to be published about the plaintiff.

16 The defendants’ false and malicious statement injured plaintiff’s reputation and his professional standing in the community and are defamatory and slanderous per se.

17 The false and malicious statement made about the plaintiff exposed and continues to expose the plaintiff to public contempt, ridicule, aversion, disgrace, induced an evil opinion of him in the minds of right-thinking persons, and deprived him of their friendly intercourse in society and deprived him of business opportunities, to wit, deprived him of the chance to be retained by more patients in his chosen profession and adversely impacted his standing in his business community.

18 As a direct result of defendants defaming the plaintiff he was pecuniarily and otherwise

harm.

19 Plaintiff has and continues to accrue special damages, to wit, plaintiff has lost and continues to lose patients due solely to the defamation of the defendants malicious acts and upon information and belief will cause plaintiff further damages.

20 Plaintiff has been emotionally harmed by the defendants' actions.

21 Plaintiff suffers from anxiety, embarrassment, humiliation and other emotional harms due solely to the defendants' actions.

22 Plaintiff has been rejected, ostracized and treated differently and worse by members of his community due solely to the defendants' actions.

23 As a direct result of the defendants' actions, plaintiff's business entity, Stamford Radiological Associates lost its contract with the Stamford Hospital in Stamford CT and was forced to close its operations on June 30, 2011.

24 By reason of the aforesaid, plaintiff has been damaged in a sum to be determined at trial and that an award of punitive damages is appropriate.

AS AND FOR A SECOND CAUSE OF ACTION
ON BEHALF OF PLAINTIFF TORTIOUS INTERFERENCE
WITH PROSPECTIVE BUSINESS ADVANTAGE

25 Plaintiff repeats, reiterates and realleges each and every allegation contained in the prior paragraphs with the same force and effect as is more fully and at length set forth herein.

26 Plaintiff's rights have been violated pursuant to the common law of the state of New York via a tortious interference with his prospective business advantage by the defendants.

27 Defendants' malicious publishing of a false and defamatory statement was done with the intent and purpose of maliciously interfering with prospective business relationships with plaintiff's patients, the defendants did in fact interfere with those relationships; the acts of defendants were undertaken with the sole purpose of harming the plaintiff and defendants' actions

did result in plaintiff being harmed.

28 By reason of the aforesaid, the plaintiff has been damaged in a sum to be determined at trial and an award of punitive damages is appropriate.

AS AND FOR A THIRD CAUSE OF ACTION
ON BEHALF OF PLAINTIFF TORTIOUS INTERFERENCE
WITH CONTRACTUAL RELATIONS

29 Plaintiff repeats, reiterates and realleges each and every allegation contained in the prior paragraphs with the same force and effect as is more fully and at length set forth herein.

30 Plaintiff's rights have been violated pursuant to the common law of the state of New York via a tortious interference with his contractual relations.

31 Plaintiff through his business entity, Stamford Radiological Associates had a contractual relationship with Stamford Hospital in Stamford CT.

32 Upon information and belief, defendants knew of the contract and of plaintiff generally having patients he attended to professionally.

33 Defendants' actions were aimed at inducing Stamford Hospital (and other business associates and patients of plaintiff's) to breach said contract.

34 Said contract was breached and plaintiff was thereby damaged.

35 By reason of the aforesaid, the plaintiff has been damaged in a sum to be determined at trial and an award of punitive damages is appropriate.

WHEREFORE, plaintiff demands judgment against the defendants in compensatory damages in sums to be determined at trial on all three of plaintiff's causes of action and in punitive damages for all three of plaintiff's causes of action along with costs and disbursements of this action; a trial by jury of all issues involved in this complaint; and such other and further relief as this Court may deem just and proper under the circumstances.

Dated: November 8, 2011
New York, New York

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